AFFIDAVIT

- I, Thomas Howie, being duly sworn, do hereby depose and state:
 - I am currently employed as a Special Agent with United States Department of Homeland Security Investigations (HSI), and have been so since January 2011. I earned a Bachelor's Degree in Business Management in 2010 from East Carolina University. As part of my official duties, I investigate criminal and administrative violations of the United States Code.
 - 2. Homeland Security Investigations (HSI) Greenville, SC received an investigative referral from HSI Colorado Springs, who is in conjunction with the Internal Revenue Service Criminal Investigations Divisions (IRS-CID), is investigating the criminal enterprise and individuals who were responsible for the commercial child exploitation website called Welcome 2 Video (W2V). W2V is hosted on the TOR¹ network ("DarkNet") at mt3plrzdiyqf6jim.onion and physically located in South Korea. W2V users have the ability to create accounts and download child pornography by either using bitcoins to purchase access or uploading child pornography and receiving "download points."
 - There were approximately 2700 user accounts on W2V worldwide. Of those 2700, approximately 133 users were located in the United States and used their personal identifiable information (PII) to purchase bitcoin which were in turn used to purchase access to the W2V account.
 - 4. On May 24, 2018, I, Special Agent (SA) Steven Michaels, and Task Force Officer (TFO) Jonathan Bastoni conducted a knock and talk at 1353 Midway Road, Pickens, South Carolina, the residence of Jeffrey Lee HARRIS. HARRIS was believed to be have purchased access to W2V. Agents made contact with HARRIS and questioned him as to his use of the DarkNet.

¹ Tor is free software for enabling anonymous communication. The name is derived from an acronym for the original software project name "The Onion Router." Tor directs Internet traffic through a free, worldwide, volunteer overlay network consisting of more than seven thousand relays to conceal a user's location and usage from anyone conducting network surveillance or traffic analysis. Using Tor makes it more difficult to trace Internet activity to the user.

- 5. HARRIS gave agents verbal consent to search his room for computers and electronic storage devices. HARRIS provided three devices to me which he stated possibly contained Child Pornography (two HP laptops and one Western Digital Hard Drive). The HP laptop was retrieved from under HARRIS' mattress, HARRIS stated this laptop contained the bulk of the child pornography.
- 6. I requested consent to remove the devices from HARRIS' residence and conduct a search of the data contained on the devices. HARRIS agreed to the search signing the ICE Form 73-005 consent to search. The form was witnessed and signed by me and SA Michaels. The three devices were detained and listed on 6051D number 1393548.
- 7. On the same date, I presented HARRIS with a type written copy of his Miranda Rights. HARRIS indicated he wish to waive those rights and agreed to answer questions regarding his internet activity. HARRIS stated he has been searching for, downloading, and viewing video files containing child pornography. HARRIS further stated he has been viewing Child Pornography for approximately 16 years. HARRIS stated he prefers to look at children between the ages of 12 and 14. HARRIS used the internet to obtain the child pornography files and the internet is an instrumentality of interstate and foreign commerce. HARRIS admitted to purchasing access to W2V to view child pornography.
- 8. On the same date, a forensic preview of one of the HP Laptops revealed the presence of multiple images and videos which depict children, under the age of eighteen (18) years old engaged in sexual acts and/or poses, and based on my training and experience is child pornography.
- 9. Based upon the foregoing, there is probable cause to believe that Jeffrey Lee HARRIS, on or May 24, 2018, did knowingly possess any matter that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and shipped and transported in interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, and shipped and transported in interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2252 and Title 18, United States Code, Section 2252A(a)(5)(B).

Respectfully submitted,

Thomas Howie Special Agent

Homeland Security Investigations

Subscribed and sworn before me this 29 day of May 2018.

The Honorable Kevin F. McDonald United States Magistrate Judge